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Tennessee Regulatory Authority
DOCKET ROOM

Reply to
Nashville Office

Charles B. Welch, Jr.
cwelch@farrismathews.com

July 22, 2005

HAND DELIVERED

Chairman Ron Jones
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

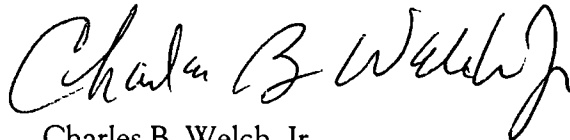
RE: Responses to Second Set of Data Requests (IRM Utility, Inc. Petition to amend Certificate of Convenience and Necessity, Docket No. 05-00056)

Dear Chairman Jones:

Please find enclosed for filing, an original and 14 copies of the referenced document. Please date stamp one copy for my records. Thank you for your assistance regarding this matter. If you have any questions, or if I may be of further assistance, please do not hesitate to contact me.

Very truly yours,

FARRIS MATHEWS BRANAN
BOBANGO HELLEN & DUNLAP, PLC



Charles B. Welch, Jr.

CBW/tp
Enclosures

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:)	
PETITION OF IRM UTILITY, INC. TO AMEND)	
CERTIFICATE OF CONVENIENCE AND)	DOCKET NO. 05-00056
NECESSITY TO SERVE AN AREA IN SEVIER)	
COUNTY, TENNESSEE KNOWN AS)	
WILD BRIAR RIDGE SUBDIVISION)	

**RESPONSES TO TENNESSEE REGULATORY AUTHORITY'S
SECOND SET OF DATA REQUESTS**

IRM Utility, Inc., ("IRM"), by and through undersigned counsel of record, hereby provides the following responses to the Tennessee Regulatory Authority's Second Set of Data Requests:

- 1. Please provide the estimated amount of contributed capital to IRM once the system is transferred to IRM.**

ANSWER: A pre-construction estimate based on materials and labor is Three Hundred Thousand Dollars (\$300,000.00).

- 2. Please provide an estimated date construction will begin and the date it is estimated to be completed.**

ANSWER: Construction is currently scheduled to begin on August 1, 2005 and to end on October 15, 2005.

- 3. Please provide the proposed tariff sheets showing the rate applicable to the new territory.**

ANSWER: Please see updated rate summary sheets attached as Exhibit 1.

- 4. Will the system being constructed for Wild Briar Ridge be capable of serving more than the Wild Briar Ridge Subdivision? Will the system be designed for expansion?**

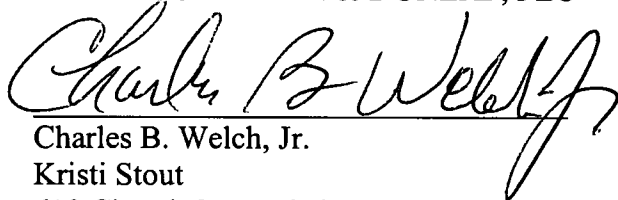
ANSWER: As designed, the system is not capable of serving an area beyond the Wild Briar Ridge Subdivision. However, the system is designed in such a manner that to make an expansion relatively simple should it become necessary to meet the needs of the subdivision. The engineers designed the system and provided for easements for future expansion if the subdivision uses a higher water capacity than was originally anticipated.

5. Please provide pre-filed testimony.

ANSWER: See attached Exhibit 2.

Respectfully submitted,

FARRIS MATHEWS BRANAN
BOBANGO HELLEN & DUNLAP, PLC

A handwritten signature in black ink, appearing to read "Charles B. Welch, Jr.", is written over a horizontal line.

Charles B. Welch, Jr.
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Attorneys for Petitioners

EXHIBIT 1

IRM Utility, Inc.
Sewer Systems with Commercial Customers or Special Contracts

System	County
Cove Mountain Realty – 03-00467 – Special Contract	Sevier
Valley Mart Exxon – 03-00467 – Special Contract	Sevier
Lot 23, The River Club – 04-00152 – Special Contract	Knox
Wild Briar Ridge – 05-00056 (Pending) – Special Contract**	Sevier
Sterling Springs – 05-00055 (Pending) – Special Contract**	Sevier

** Residential rate of \$35.11/month will apply unless units are on rental programs or have high bedroom capacities requiring a commercial rate (See commercial tariff sheet).

IRM Utility, Inc.
Sewer Systems with Residential Customers

System	Monthly Charge
Emory Pointe – 04-00101 – Sheet 2	\$35 11
Wild Pear Shores – 04-00153 – Sheet 3	\$35 11
Compass Pointe – 04-00266 - Sheet 4	\$35.11
Lashbrooke – 04-00268 - Sheet 5	\$35 11

EXHIBIT 2

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:)	
PETITION OF IRM UTILITY, INC. TO AMEND)	
CERTIFICATE OF CONVENIENCE AND)	DOCKET NO. 05-00056
NECESSITY TO SERVE AN AREA IN SEVIER)	
COUNTY, TENNESSEE KNOWN AS)	
WILD BRIAR RIDGE SUBDIVISION)	

PRE-FILED DIRECT TESTIMONY OF SCOTT WILLIAMS

Q. State your name for the record and your position with the Petitioner, IRM Utility, Inc.

A Scott Williams I am the Vice President of IRM Utility, Inc.

Q: Are you presenting testimony on behalf of IRM, Utility, Inc.

A Yes

Q: Did you assist and cause to filed the Petition in this proceeding requesting an expansion of service area and an extension of authority for IRM to provide waste water sewer services in Sevier County to a residential subdivision known as Sterling Springs?

A Yes

Q: Can you describe the service you will be providing

A IRM plans to operate an on site wastewater treatment facility that beneficially reuses the water in subsurface drip irrigation systems.

Q: Do you operate any systems in this area?

A IRM currently operates systems in both Sevier County as well as surrounding counties We operate systems at Cove Mountain Realty and Valley Mart Exxon in Sevier County Wild Pear Shores, Compass Pointe, LashBrooke, and Emory Pointe are in surrounding counties We have two pending projects including Wild Briar Ridge in Sevier County

Q. When did the company receive its first certificate from the Authority to operate a sewer system in Tennessee?

A March 16, 2004.

Q. Does IRM Utility, Inc. have the management, technical and financial ability to provide wastewater service in the area referred to in this Petition?

A Yes

Q: Have you contacted other potential utility service providers in the area to determine whether they might have any plans to service the area?

A Yes Both the Sevier County Government and the City of Pigeon Forge have provided letters indicating that they do not intend to provide wastewater service The letters were attached as Exhibit B and Exhibit C to the Petition

Q: Is all of the information in the petition accurate to the best of your knowledge.

A Yes, it is

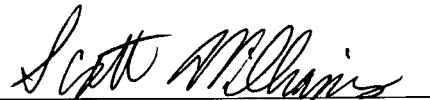
Q: Have you submitted plans to the Tennessee Department of Environment and Conservation for approval?

A Yes These plans have been approved by TDEC as answered in the previous data request

Q: Does this conclude your testimony?

A Yes

I swear that the foregoing testimony is true and correct to the best of my knowledge



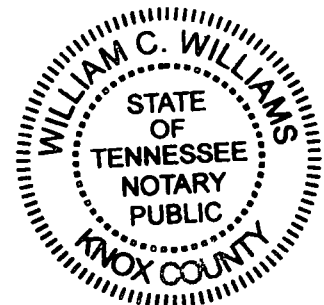
Name. Scott Williams
Title Vice President
IRM Utility, Inc

STATE OF TENNESSEE)
COUNTY OF KNOX)

Subscribed and Sworn to me this 21th day of July, 2005

William C Williams
Notary Public

My Commission Expires. 8 Feb 2009



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